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7
8 **UNITED STATE DISTRICT COURT**
DISTRICT OF NEVADA

9 CHANDRA K. WALLICK,

10 Plaintiff,

11 v.

12 EQUIFAX INFORMATION SERVICES,
13 LLC; HYUNDAI FINANCE; SANTANDER
CONSUMER USA,

14 Defendant.

Case No.: 2:19-cv-01788-JCM-BNW

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEFENDANT
HYUNDAI CAPITAL AMERICA'S
TIME TO RESPOND TO COMPLAINT**

(FIRST REQUEST)

15
16 This Stipulation to Extend Time to Respond to Complaint is made by and between Plaintiff
17 Chandra K. Wallick ("Plaintiff") and Defendant Hyundai Capital America ("Hyundai"), incorrectly
18 named as Hyundai Finance, through their respective counsel, in light of the following facts:

19 **RECITALS**

- 20 A. Plaintiff filed the Complaint ("Complaint") against Hyundai on or about October
21 15, 2019.
- 22 B. Hyundai was served with the Complaint on October 17, 2019.
- 23 C. Hyundai understands that a response was therefore due on November 7, 2019.
- 24 D. Hoping to resolve the matter outside of litigation, a representative from Hyundai
25 contacted counsel for Plaintiff prior to the deadline to respond and requested a settlement demand.
26 However, Hyundai did not receive a response and, in waiting, the deadline to respond passed.
- 27
28

1 E. Hyundai has now retained counsel, and undersigned counsel is contemporaneously
2 filing its appearance in this matter.

3 F. The parties agreed to extend Hyundai's time to respond to the Complaint through
4 December 10, 2019, in order to give Hyundai further time to investigate Plaintiff's claims and
5 prepare a proper response, and for the parties to discuss a potential resolution of this matter.

6 G. There is good cause to grant this stipulation because Hyundai is still in the process
7 of investigating the claims and Plaintiff's counsel has indicated he would be providing a settlement
8 demand for Hyundai's consideration.

9 H. Pursuant to Local Rule IA 6-1 and Local Rule 7-1, Plaintiff and Hyundai
10 respectfully request that the Court extend Hyundai's time to respond to Plaintiff's Complaint through
11 December 10, 2019.

12 **STIPULATION**

13 **NOW, THEREFORE**, Plaintiff and Hyundai hereby stipulate and agree that Hyundai has
14 up to and including December 10, 2019, to file a response to Plaintiff's Complaint.

15 DATED: November 14, 2019

DATED: November 14, 2019

16 LEWIS ROCA ROTHGERBER
17 CHRISTIE LLP

HAINES & KRIEGER, LLC

18 By: /s/ J Christopher Jorgenson
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27 **IT IS SO ORDERED**

28 **DATED: November 15, 2019**



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

